UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RCRA Compliance Evaluation Inspection

Ashland Performance Materials
Maleic Anhydride Neal Plant
100 Big Sandy River Road
Kenova, West Virginia 25530

Telephone Number: (304) 528-2634

Date of Inspection: 1/26/12

RCRA Identification Number: WVD080645831

EPA Representative:

Clark S. Conover
Environmental Scientist
RCRA Compliance & Enforcement
(304) 231-0502

Facility Representatives:

Nicolas A. Collucci
Technical Supervisor

Steve Dunsmore
Plant Manager

Background

The Neal Plant produces a single product identified as Maleic Anhydride. Maleic Anhydride is an organic plastic which is utilized in medicines; however the majority of the product is utilized as a fiberglass product in home siding and boats. The Neal Plant is a large quantity generator. The Biennial Report submitted in 2010 documented that the Neal Plant generated a total of 108,553 pounds of hazardous waste in 2009 or an average of 9,046 pounds (4,112 kilograms) per month (Addendum 1). The Neal Plant was part of the Marathon Petroleum Company until it was sold to Ashland Inc. on December 1, 2010. The Neal Plant employs approximately forty personnel and is located on eleven acres (Addendum 2).

Inspection Observations & Process Description

The physical inspection began with an inspection of the Neal Plant's less than 90 day storage area (Photo #1). The storage area is located behind a locked gated fence on an impermeable floor which is slanted to prevent any spillage from escaping. Each bay of the storage area is also equipped with a small self contained pit to contain any spillage (Photo #6). There were two 55 gallon drums of hazardous waste in the storage area at the time of the inspection. Both drums were closed, labeled, dated within the previous 90 days and although they were rusty the drums were structurally sound (Photos #2, #3 & #4). The storage area also held a 350 gallon tank utilized for the storage of used oil. The tank was closed and labeled as containing "USED OIL" (Photo #5). The next area inspected was the facility's laboratory (Photo #9). There were no hazardous wastes in the laboratory at the time of the inspection. The satellite accumulation drum utilized for laboratory waste is located on the exterior of the building in a lockable tote. The drum was labeled, closed and although the drum appeared rusty the drum was structurally sound (Photo #7). The exterior of the tote was labeled as containing Maleic Anhydride Lab Wastes and is identified as satellite accumulation area UN2215 (Photo #8).

The EPA inspector requested that the facility representative walk him through the process from beginning to end. Butane is the base product for the production of Maleic Anhydride, the final product. The first part of the process is the truck unloading station for incoming Butane (Photo #10). The Butane is stored in three large above ground storage tanks (ASTs) (Photo #11). From the Butane storage ASTs, the Butane is sent to a vaporizer and then the vaporized Butane is mixed with air and sent to a reactor (Photo #13(Reactor D-208)) where a heat transfer salt mixture of Sodium Nitrate, Potassium Nitrate, and Sodium Nitrite serve as a coolant on the shell side of the reactor. Two of the four reactors (D-210 and D-211 reactors) also have a very small amount of Chromium in

the heat transfer salt. The tube side has Vanadium Pyrophosphate catalyst changing the Butane air mixture into Maleic Anhydride. The Butane and air mixture enters the reactor at approximately 300° Fahrenheit and the Maleic Anhydride leaves the reactor at approximately 800° Fahrenheit. The facility has four reactors. The spent salt solutions are sent out as a hazardous waste. The vanadium pyrophosphate catalyst is either recycled or sent out as a hazardous waste. The Maleic Anhydride then passes through a series of exchangers prior to going to a separator. The separator segregates the liquid and solid phases of the Maleic Anhydride.

The vapor phase of the Maleic Anhydride is approximately 55% pure. The vapor phase is sent to a Maleic Acid Scrubber (Photo #18) prior to being mixed with the liquid phase from the Maleic Anhydride Separator in a Batch Refiner (Photo #21). The liquid phase is approximately 95% pure when it leaves the Separator.

The Maleic Anhydride and Maleic Acid then undergoes Batch Process Distillation. The distillation process first has Xylene added in the Batch Refiner. Waste containing Xylene gets sent out as hazardous waste. After the Xylene, Maleic Acid and Maleic Anhydride are sent to the Batch Refiner. They are reboiled in the Still Pot (Photo #22). The Maleic Anhydride passes to a Condenser and Decanter or Reflux Drum prior to being delivered to the Product Storage Tank. The Maleic Anhydride is approximately 99.97% pure when delivered to the Product Storage Tank. Xylene recovered during the Batch Process Distillation is returned to the Xylene Cut Tank (Photo #17) for reuse. Every three to five batches, the distillation column is washed out. The wash outs are sent to the waste Maleic Acid Tanks. Acidic waste water which is generated during clean out of the tank bottoms is treated for PH prior to being discharged to a waste Maleic Acid Tank (Photo #23). Washouts of the distillation columns (M-1410A) are pumped into tanker trucks for removal as a nonhazardous waste or pumped across the river (Photo #12) where it is treated at the Marathon wastewater plant. There are no ponds associated with the waste water tanks or pits (Photos #15 & #16).

The facility's air permit requires that all fugitive vapors from the processes be captured and are sent through emission abatement scrubbers and thermal oxidizers which raise the temperature of the vapors from 150° to 1,500° Fahrenheit (Photo #20). The final discharge is mostly Carbon Monoxide and Carbon Dioxide, but it also contains other VOCs. A flow chart of the processes is attached (Addendum 3).

The final part of the physical inspection concentrated on Universal Wastes. The facility had five containers of Universal Waste fluorescent bulbs. The containers were all labeled as "Universal Waste", were closed and were in good condition (Photos #24 & #25). The final area inspected was the facility's maintenance shop. There was no hazardous waste located in this area but there was a single parts cleaner (Photo #26). The parts cleaner is serviced by Safety Kleen.

Training

Training records included an organizational chart listing each person's job title, a list of each type of training to be given and which employees need to attend the training. Annual RCRA training is required for all personnel in Operations, Maintenance, Management Staff and Lab employees. Records indicated that a number of employees whom require annual RCRA training did not receive that training in 2010. When questioned about the lack of training Mr. Collucci explained that the company was overhauling its training program in 2010 and the overhaul did not get completed until November 2010. Mr. Collucci further stated that training had resumed and he expected all personnel to have completed the training by the end of February. The SPCC and RCRA training are given together (Addendum 4).

Inspections

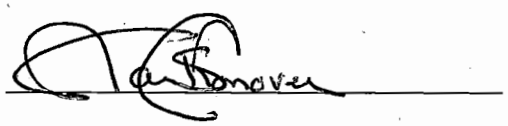
The facility maintains records which documented that the less than 90 day storage area is inspected weekly. Records were reviewed for the previous 12 months and found to be complete.

Manifests

The facility had seven shipments of hazardous waste in 2010 for a total of 66,110 pounds of hazardous waste. All manifests had a receiving facilities signature and were accompanied by LDR forms. Copies of all 2010 manifests are attached (Addendum 5).

Contingency Plan

The Contingency Plan was reviewed and found to be up to date and to meet the requirements of Subpart C of Part 265. Local authorities have been provided with copies of the pertinent portions of the plan and in addition to being equipped with city water the facility maintains a 600,000 gallon fire water tank.



Clark S. Conover

February 15, 2012
Date

Inspection Checklist

EPA GENERATORS CHECKLIST

Name of Facility: **Ashland Performance Materials**
Address: **100 Big Sandy River Road**
Kenova, West Virginia 25530

EPA ID#: **WVD080645831**
Name/Title of
Facility Rep: **Nicolas A. Collucci**

I. Provide a brief description of the type of operation(s) that produce hazardous waste at the facility: **ASHLAND produces a single product identified as Maleic Anhydride. Maleic Anhydride is an organic plastic which is utilized in medicines; however the majority of the product is utilized as a fiberglass product in home siding and boats. ASHLAND is a large quantity generator. The Biennial Report submitted in 2010 documented that ASHLAND generated a total of 108,553 pounds of hazardous waste in 2009 or a average of 9,046 pounds (4,112 kilograms) per month.**

2. Does this facility perform the following on-site:

a. Storage (greater than 180 days) of hazardous waste: **No**

b. Treatment of hazardous waste: **No**

c. Disposal of hazardous waste: **No**

If yes, complete appropriate TSD checklists.

List the average amount of each type of hazardous waste generated on a monthly basis.

Waste Code	Amount Generated
D002/U147	**3,363 Lbs.**
D001/D007	**22,720 Lbs.**
D001	**82,440 Lbs.**
D009	**30 Lbs.**

3. Is the facility subject to any exclusions for its hazardous waste: **No**
If yes, list waste and basis for exclusion.

4. Waste Minimization: What has been done facility wide to reduce the volume and or toxicity of the waste generated? **Maleic Anhydride sample purges no longer sent out as a waste but rather are reintroduced into the process for recycling.**

5. Does the facility generate any characteristic hazardous waste? **Yes**
If yes, describe how these characteristics were determined, i.e.
testing or knowledge process/material used. **Knowledge/testing/process materials used.**

6. Does this facility contemplate any changes in its operation from a hazardous waste generation or management perspective? **No**
If yes, describe:

II. Manifest (Complete this section only if facility ships hazardous waste off-site)

262.20(a)
1. Does this facility use the Uniform Hazardous Waste Manifest? **Yes**
If no, describe the system used.

If yes, review a representative number of manifest and indicate whether they contain:

a. Generators name mailing address, telephone number and EPA ID number? **Yes**

b. Transporters name and EPA ID number? **Yes**

c. DOT waste description, including proper shipping name, hazardous waste class and DOT identification numbers? **Yes**

d. Number and type of containers, if applicable? **Yes**

e. Quantity of each waste transported? **Yes**

f. Name, EPA ID number and site address of the facility designated to receive the waste? **Yes**

g. The following certification? **Yes**

"I hereby declare that the contents of this consignment are full and accurately described above by proper shipping name and are classified, packaged, marked, and labeled, and in all respects are in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and environment."

2.2.23(a)
2. Did the generator:

a. Sign and date the manifest? **Yes**

b. Obtain the handwritten signature and the date of acceptance from the initial transporter? **Yes**

c. Ensure the return copies of the manifest from the TSD facility were properly signed and dated? **Yes**

d. Retain a copy of the signed manifest for at least three years? **Yes**

(The inspector should obtain copies of any manifests that are found to have problems)

III. Pre-Transport Requirements

Manifest System: (Complete only if the facility ships hazardous waste off-site)

1. Identify the names and address of off-site facilities which have received waste from this generator. **See attached Biennial Report.**

2. Is there any indication that the facility is:

262.30
a. Not packaging its waste in accordance with DOT regulations (49 CFR Parts 173, 178 and 179)? **No**

262.31
b. Not labeling each package in accordance with DOT regulations (49 CFR Part 172)? **No**

262.32 (a) & (b)
c. Not marking each container of 110 gallons or less with the words "hazardous waste ------" or each package of hazardous waste in accordance with DOT regulations (49 CFR Part 172)? **No**
If yes, explain:

262.33
3. Does the facility placard or offer the transporter placards for its hazardous waste shipments? **Yes**

IV. Waste Accumulation

1. Does the facility use the following types of hazardous waste accumulation:

   a. Satellite accumulation? **Yes**

   b. Less than 90 day storage? **Yes**

Answer the following questions if the generator has satellite accumulation area(s).

262.34(c)(1)
2. Is the satellite area(s) near the point of waste generation and under the control of the operator of the process actually generating the waste? **No**
If no, describe. **Satellite accumulation occurs in a 55 gallon drum located within a lockable container which is located on the exterior of the laboratory. See Photos #7 & #8.**

262.34(c)(1)
3. Are there multiple satellite accumulation areas for any one process that generate hazardous waste? **No**
If yes, describe.

262.34(c)(1)
4. Is the waste stored in container(s)? **Yes**

265.171
5. Are the container(s) in good condition? **Rusty, structurally sound. Facility advised to inspect empty drums when they arrive and to reject drums which show signs of corrosion.**

262.34(c)(1)(ii)
6. Are container(s) marked with the words "hazardous waste" or with other words identifying the contents? **Yes**

265.173(a)
7. Are container(s) kept closed? **Yes**

265.171
8. Are container(s) leaking? **No**
If yes, describe:

262.34(c)(1)
9. Has the facility accumulated more than 55 gallons of hazardous waste or more than 1 quart of acutely hazardous waste in a satellite accumulation area? **No**

If yes, answer the following questions.

a. Are the container(s) holding excess waste dated as to when accumulation began? **N/A**

b. Does the excess waste comply with the less than 90 day storage requirements (40 CFR Part 262.34(a)) within three days of the time when accumulation of such waste began? **N/A**

Answer the following questions if the facility has less than 180 day storage.

10. Does the facility maintain personnel training and other records required in 40 CFR Part 265.16? **Yes**

If yes, do these records include:

265.16(d)(1)
a. Job title for each person related to hazardous waste management and the employees filling each job? **Yes**

265.16(d)(2)
b. A written job description for each position? **Yes**

265.16(d)(3)
c. A written description of the type and amount of training that will be given to each person? **Yes**

265.16(d)(4)
d. Documentation that the training or job experience required by the facility personnel to effectively respond to emergencies and other wise manage hazardous waster in a proper manner has been successfully completed? **No**

265.16(b)
11. Have facility personnel successfully completed the required training or job experience within six months after occupying the position? **No**

265.1(c)
12. Do facility personnel take part in an annual review of initial training requirements and update them as necessary? **Yes**

262.34(a)(4)
13. Does the facility maintain an adequate preparedness and prevention program as required in 40 CFR 265 Subpart C? **Yes**

Is the facility equipped with:

265.32(a)
a. Internal communications or alarm system? **Yes**

265.32(b)
b. Telephone or hand-held two way radio? **Yes**

265.32(c)
c. Portable fire extinguishers or other fire control equipment, spill control equipment and decontamination equipment? **Yes**

265.32(d)
d. Adequate volume of water? **Yes, both city water and a 600,000 gallon fire water tank.**

265.33
14. Does the facility maintain the above equipment to assure its proper operation? **Yes**

262.34(a)(4)
15. Has the facility prepared a contingency plan and is it maintained at the facility? **Yes**

If yes, does it contain the following:

a. Descriptions of the actions that are to be taken in case of an emergency (all potential types of emergencies should be identified)? **Yes**

b. Description of arrangements made with local authorities? **Yes**

c. Current list of emergency coordinator names, addresses and phone numbers (office and home)? **Yes**

d. List of all emergency coordinators names, addresses and phone numbers (office and home)? **Yes**

e. Evacuation plan for facility personnel? **Yes**

The inspector should obtain a copy of the facility's contingency plan if problems are found.

265.53(b)
16. Were copies of the contingency plan presented to local authorities that may provide emergency services? **Yes**

17. Has the facility's contingency plan ever failed in an emergency? **No**
If yes:

265.54(b)
a. Was the contingency plan immediately amended? **N/A**

265.56(j)
18. If the contingency plan is implemented, does the facility record the incident in its operating log and submit a written report of the incident to the appropriate state agency? **Yes**

262.34(a)(1)
19. What is the method of hazardous waste storage:
Containers? **Yes**
Tanks? **No**
Other? **Yes (roll-offs)**

262.34(a)(2)&(3)
20. Are the container(s) marked with the words "Hazardous Waste" and the date that accumulation in that container began? **Yes**

262.34(a)
21. Based upon accumulation dates, have any container(s) been in storage more than 90 days?
No If yes, inspector should complete the appropriate TSD checklists.

265.171
22. Are container(s) in good condition? **Yes, with surface rust.**
If no, explain:

265.172
23. Are containers made out of or lined with materials which will not react with or be incompatible with the wastes they are storing? **Yes**

265.173(a)
24. Are containers kept closed? **Yes**

265.171
25. Are any container(s) leaking? **No**
If yes, describe:

265.174
26. Are container storage area(s) inspected at least weekly and is an adequate inspection record/log maintained? **Yes**
If no, explain:

265.35
27. Is adequate isle space maintained? **Yes**
If no explain:

265.176
28. Are container(s) holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line? **Yes**

29. Are incompatible wastes placed in the same container(s)? **No**
If yes, explain:

265.177(a)

a. Is there any evidence that conditions of extreme heat or pressure, fire or explosion, violent reactions or toxic emissions occurred. **No** If yes, describe:

265.177(c)

30. Are container(s) holding incompatible hazardous wastes properly separated or protected from one another while in storage? **Yes**

Answer the following questions if the facility uses tank storage:

262.34(a)(3)

31. Is the tank(s) labeled or clearly marked with the words "Hazardous Waste"? **N/A**

262.34(a)

32. Is the tank(s) marked with the date that accumulation began in the tank(s) or does the facility have in its records when waste accumulation started in the tank(s). **N/A**

262.34(a)

33. Based upon start accumulation dates, has the facility stored hazardous waste in tank(s) for more than 90 days? **N/A**
If yes, complete the appropriate TSD checklist.

34. Which of the following describes the tank(s) employed at this facility (highlight appropriate response(s))?

a. Indoor - not on an impermeable floor

b. Indoor - on impermeable floor

c. Outdoor - above ground

d. Outdoor - in ground

e. Outdoor - underground

35. What is the approximate age of the tank(s)? **N/A**

265.191

36. Does the tank(s) appear to be in good condition? **N/A**
If no, describe:

265.191
37. Is the tank(s) leaking? **N/A**
If yes, describe:

265.193
38. Is the tank(s) provided with an effective secondary containment system? **N/A**

265.191(b)
39. Was a leak test performed on the tank(s)? **N/A**

265.194(b)
40. Is the tank(s) provided with adequate controls to prevent spills or overflows (i.e. automatic feed cutoff, bypass to another unit, high level alarms, etc.) **N/A**

265.194(b)
41. Is there sufficient freeboard (2 feet) in uncovered tank(s) to prevent overtopping by wave or wind action or precipitation? **N/A**

265.195(a)
42. Is tank(s) inspected each operating day? **N/A**

If yes, do inspections include:

265.195(a)(1)
a. Overfill/spill control equipment? **N/A**

265.195(a)(2)
b. Above ground portions of the tank(s) for corrosion or releases? **N/A**

265.195(a)(3)
c. Data gathered from monitoring equipment and leak detection equipment? **N/A**

265.195(a)(4)
d. Area immediately surrounding the external accessible portion of the tank(s) and secondary containment system for signs of erosion and releases? **N/A**

265.195(b)(4)
43. Does this facility perform annual inspections of the cathodic protection system, if present? **N/A**

265.195(c)
44. Does the facility properly document all of the results of its tank system inspections? **N/A**

265.196

45. Is there any indication that the facility did not properly respond to spills or leaks from a tank(s) (this would include failure to stop the spill/leak, failure to clean up spilled/leaked material, failure to minimize migration, failure to remove tank(s) from service immediately, failure to provide notification, etc.)? **N/A**
If yes, describe:

46. Does the facility store any ignitable or reactive waste in the tank(s)? **N/A**
If yes:

265.198(a)(1)
a. Is the waste treated, rendered or mixed before or immediately after placement in the tank(s) so that it no longer meets the definition of ignitable or reactive waste?

265.198(a)(2) **N/A**
b. Is the waste stored in such a way that it is protective from any material or condition that may cause the waste to ignite or react? **N/A**

265.198(a)(3)
c. Is the tank(s) used solely for emergencies? **N/A**

265.198(b)
d. Does the tank(s) appear to be a safe distance from the facility's property line and public thoroughfares? **N/A**
If no, describe:

47. Is there any indication that incompatible wastes are being stored in a tank(s)? **N/A**

V. Record Keeping and Reports

262.42(a)(2)
1. Does the facility prepare and Exception Report and submit it to the Regional Administrator if a signed copy of the manifest is not received within 45 days of the date the waste was accepted by the initial transporter? **N/A**
If yes:

a. Legible copy of the manifest?

b. Cover letter explaining generators efforts to locate waste and the result of those efforts?

262.41(a)
2. If the facility ships any hazardous waste off-site, does it prepare a Biennial Report and submit it to the Regional Administrator by March 1 of each even numbered year. **Yes**

If yes, does the Biennial Report include:

262.41(a)(3)
a. EPA ID number for each off-site TSD facility to which waste was shipped during the year? **Yes**

262.41(a)(4)
b. EPA ID number for each transporter used during the year? **Yes**

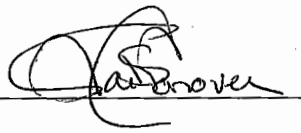
262.41(a)(5)
c. Description and quantity of each hazardous waste shipped off-site (listed by EPA ID number of each TSD facility to which it was shipped)? **Yes**

262.41(a)(6)
d. Efforts undertaken during the year to reduce the volume and toxicity of the waste generated? **No**

262.41(a)(7)
e. Description of the changes in volume and toxicity of the waste actually achieved during the year? **No**

262.40(a)(b)(c)
3. Does the facility retain copies of Biennial Reports, Exception Reports and test results/waste analysis for a minimum of three years from the date the waste was last sent to on-site or off-site treatment, storage or disposal? **Yes**

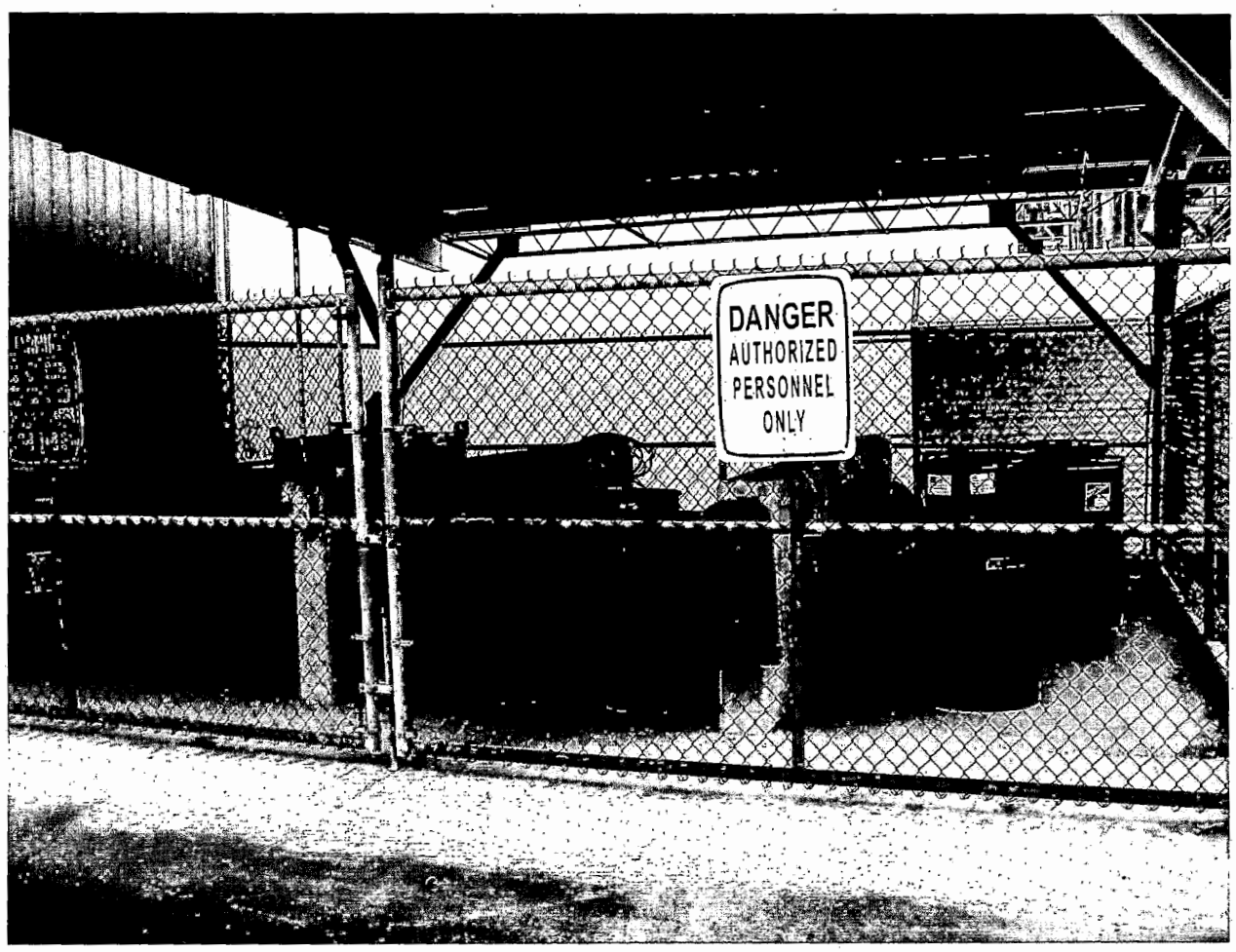
Inspectors Name: Clark S. Conover
Title: Environmental Scientist
Agency: USEPA
Office Location: Wheeling, WV
Date of Inspection: January 26, 2012



February 15, 2012
Date

Clark S. Conover

Photographs



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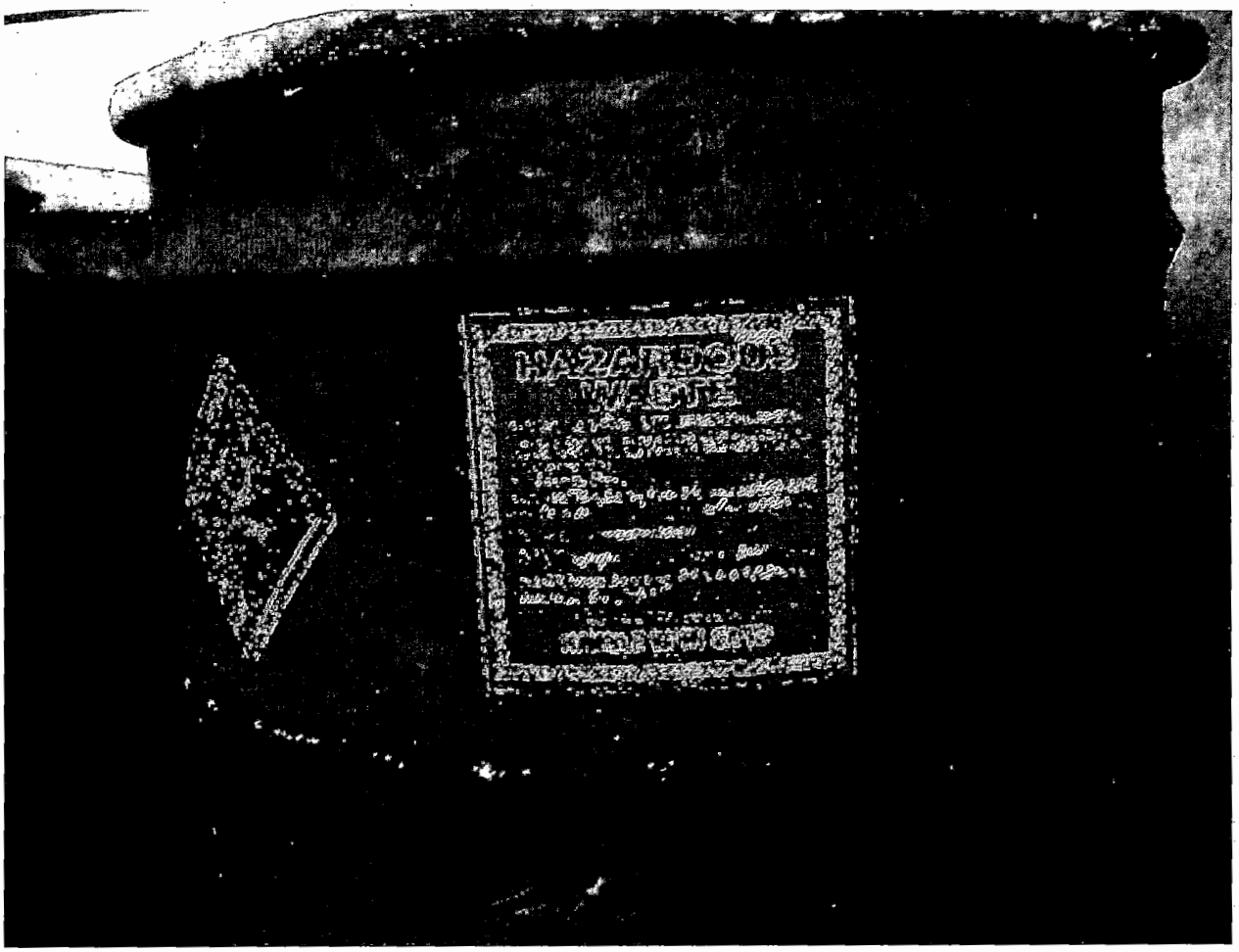
Photo#: 1

This photo depicts the less than 90 day storage area.



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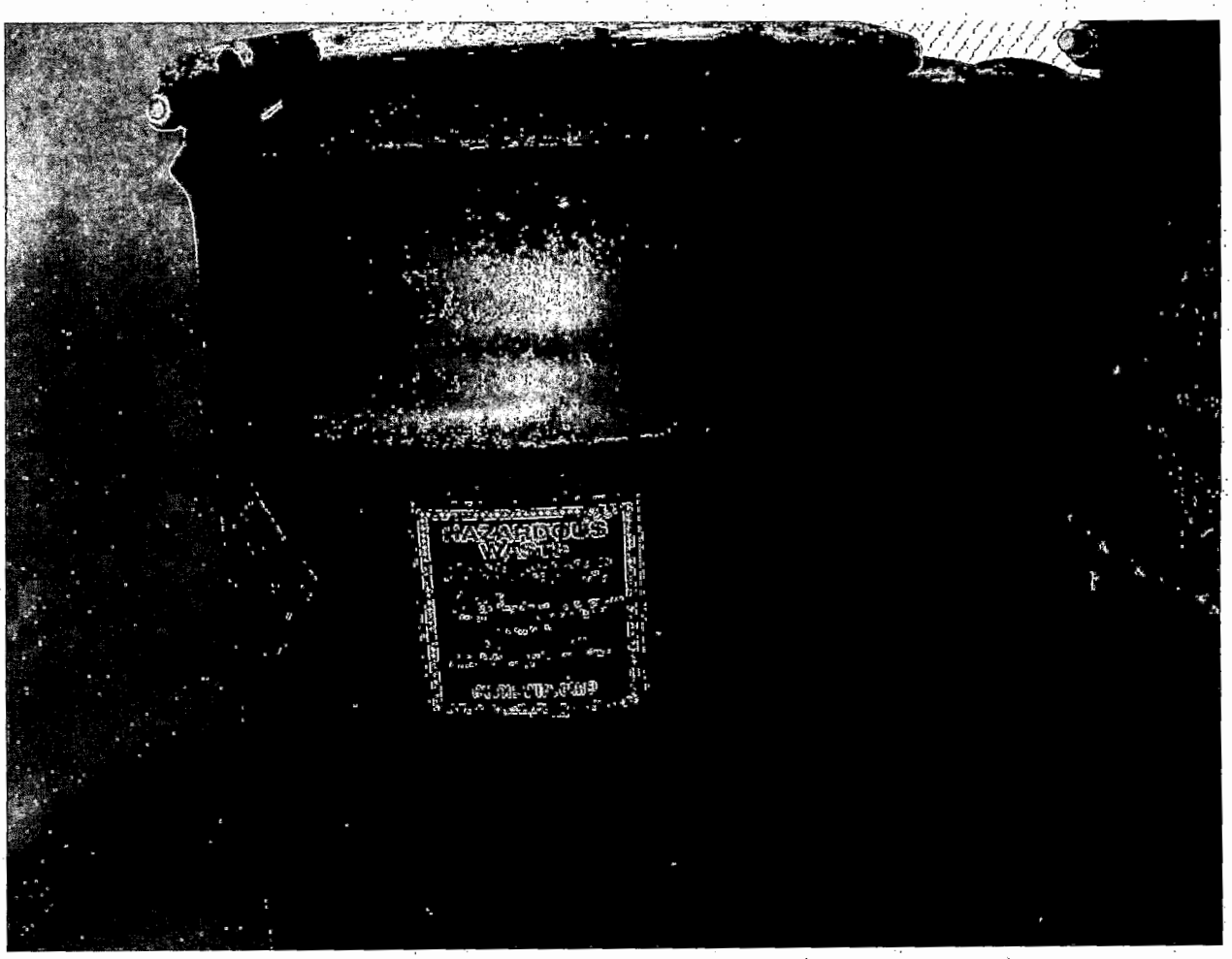
Photo#: 2

This photo depicts the label on one of the drums in the less than 90 days storage area.



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Photo#: 3

This photo depicts the drums in the less than 90 days storage area.

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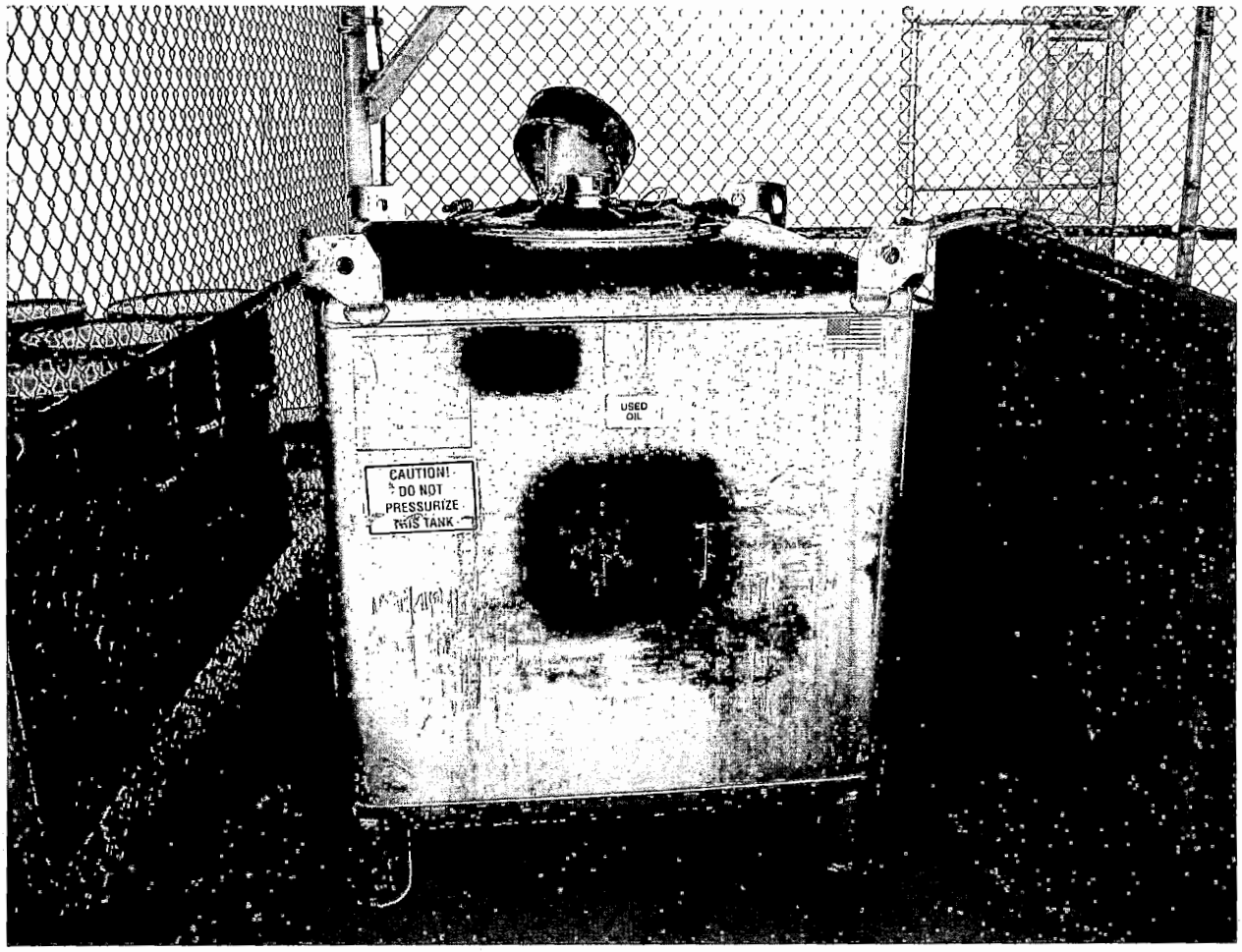
Photo#: 4

This photo depicts the less than 90 day storage area.



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Photo#: 5

This photo depicts the used oil storage tank in the less than 90 day storage area.

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Photo#: 6

This photo depicts one of the self contained sump drains in the less than 90 day storage area.

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Photo#: 7

This photo depicts the satellite accumulation drum located outside of the laboratory.

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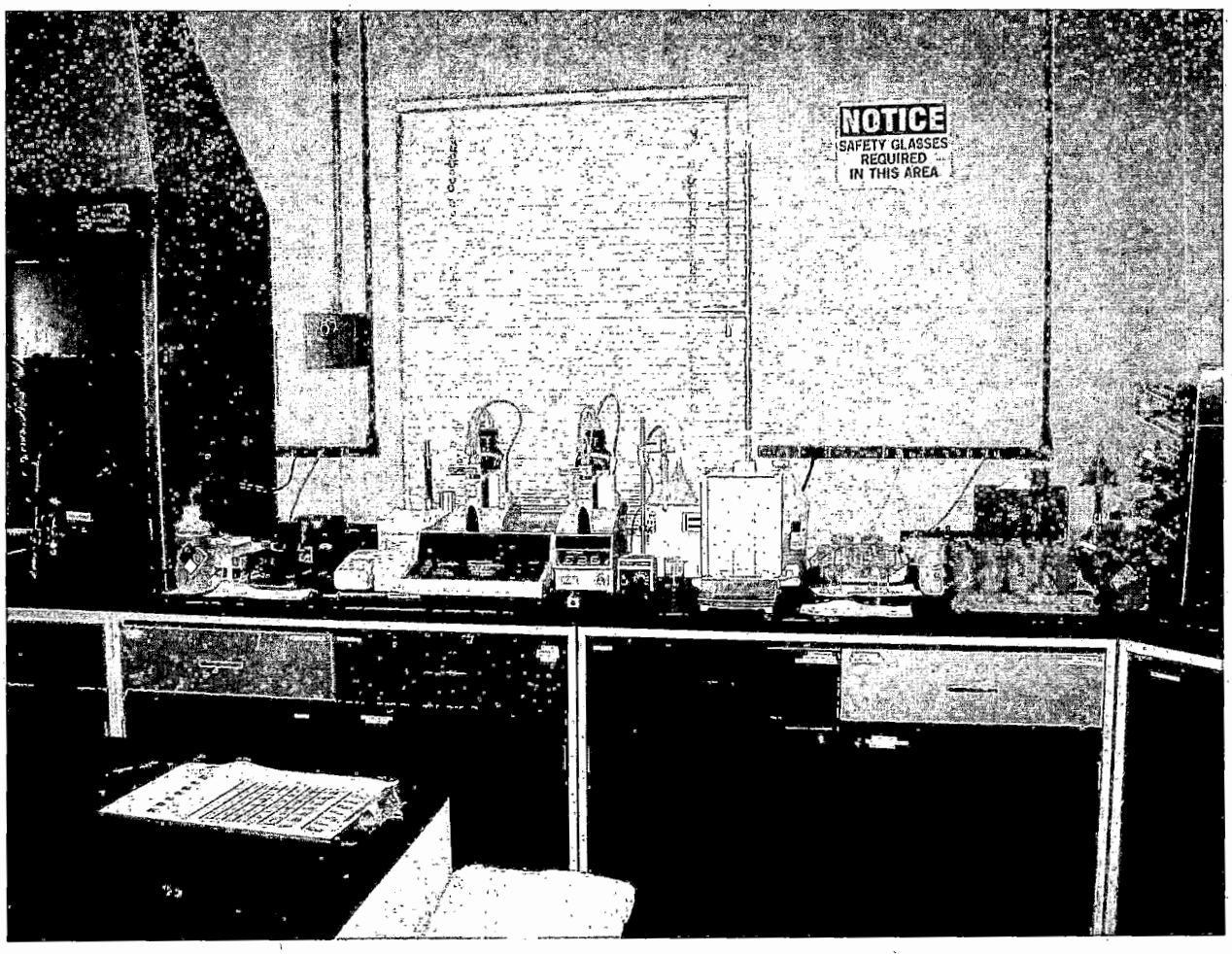
Photo#: 8

This photo depicts the cabinet hold the satellite accumulation drum outside the laboratory.



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Photo#: 9

This photo depicts the laboratory associated with the satellite accumulation drum.

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Photo#: 10

This photo depicts the butane unloading area.

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Photo#: 11

This photo depicts the butane storage tanks.

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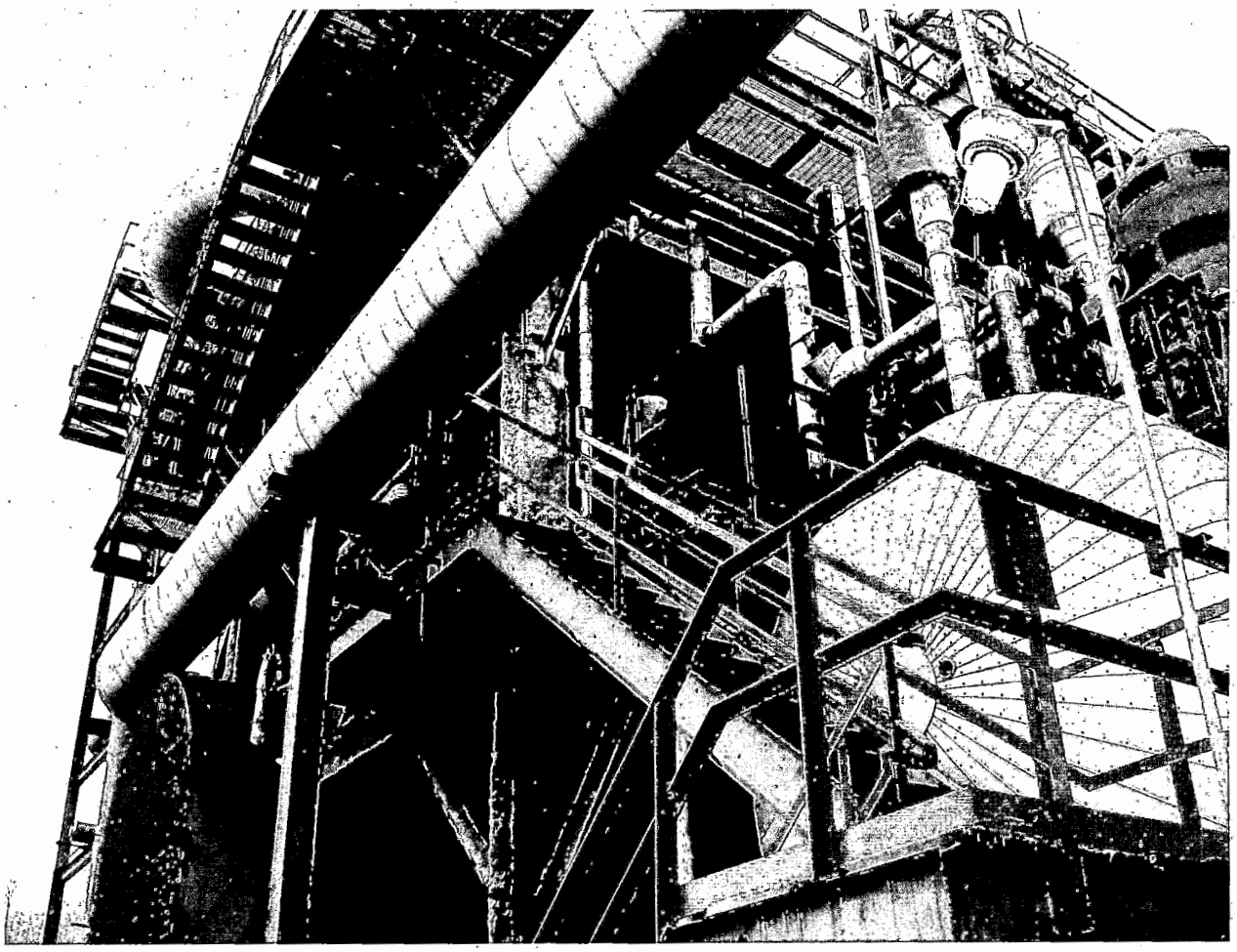
Photo#: 12

This photo depicts the bridge to the Marathon waste water plant.



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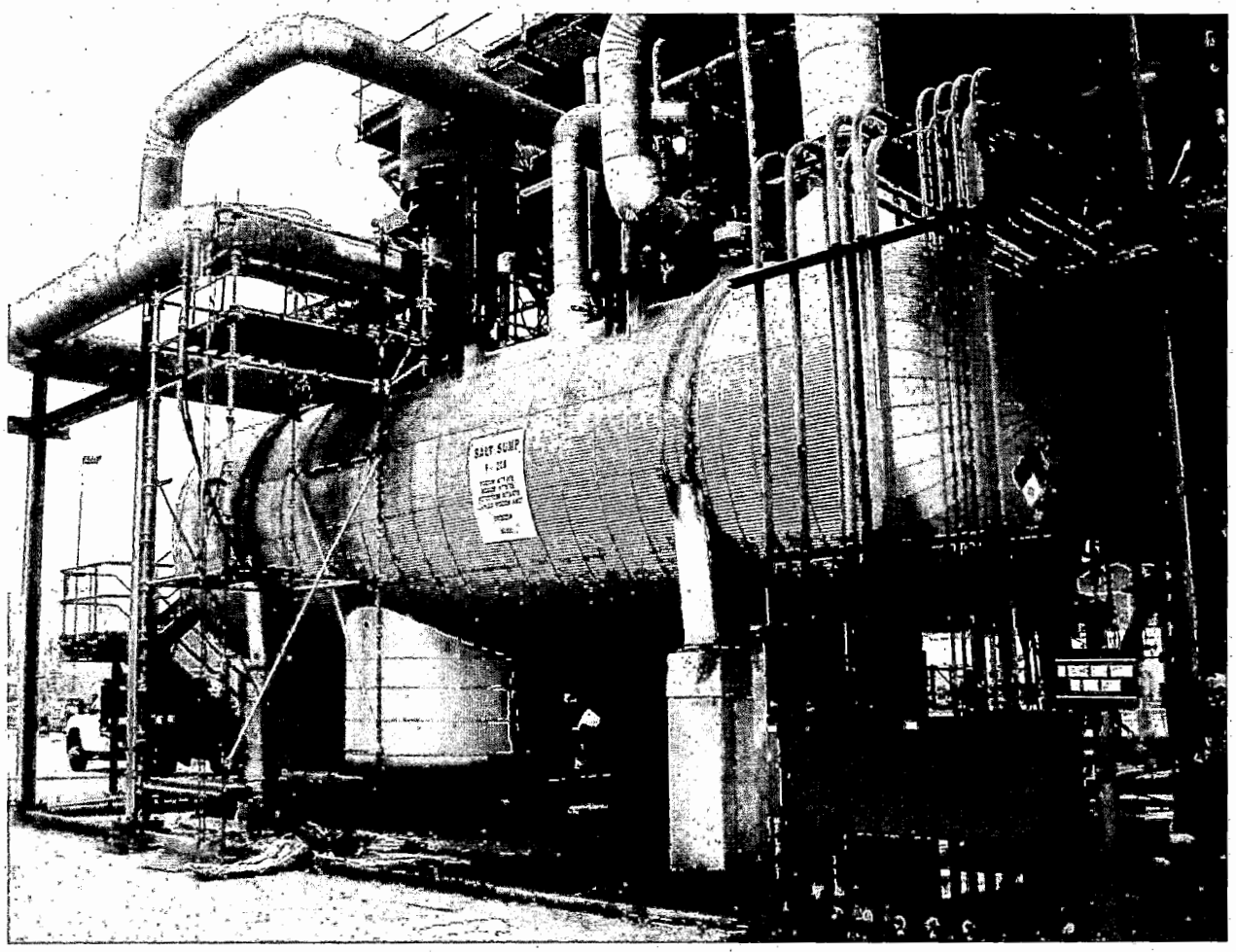
Photo#: 13

This photo depicts Reactor #208.



Ashland Performance Materials
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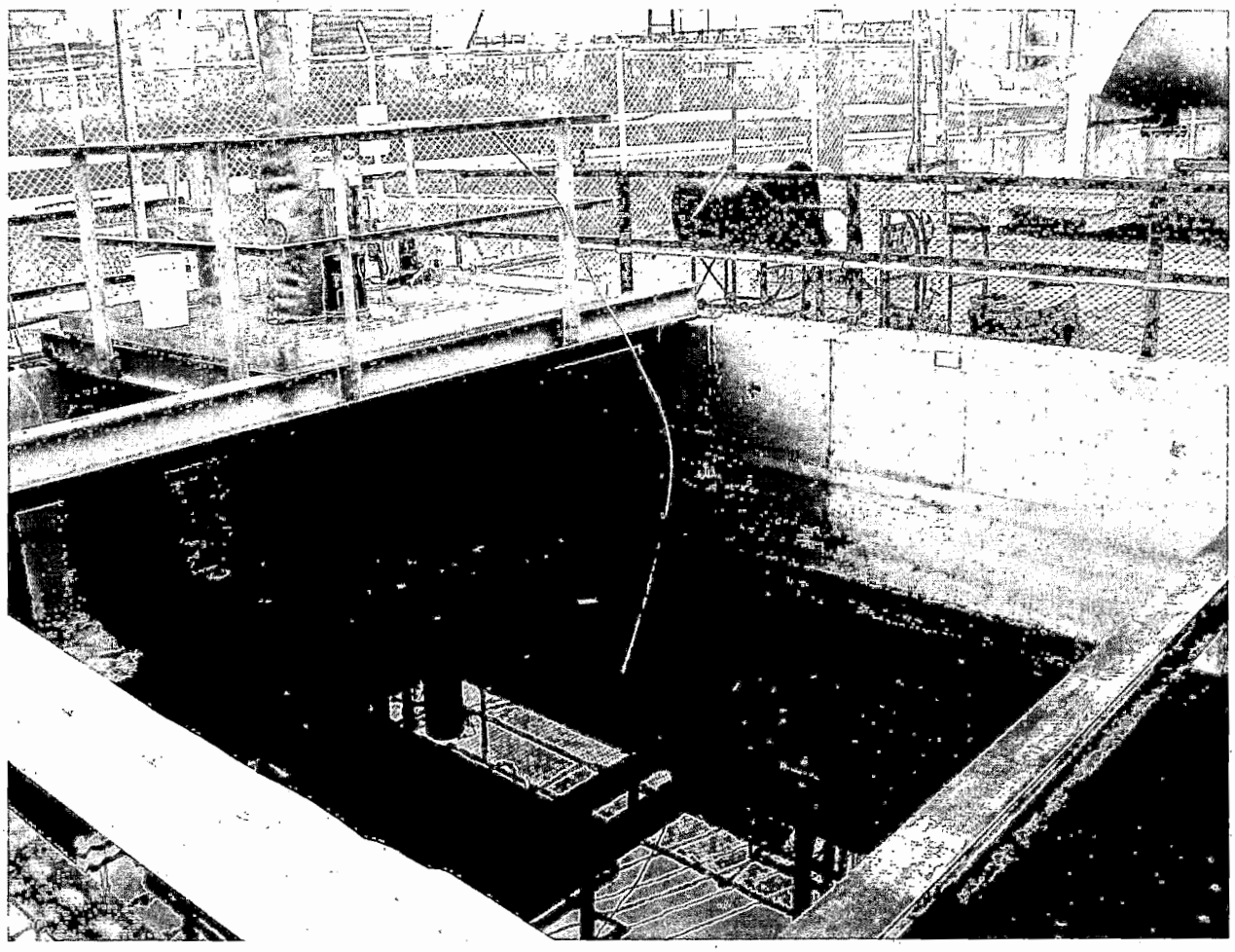
Photo#: 14

This photo depicts the salt sump.



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Photo#: 15

This photo depicts the 1411 Pit.

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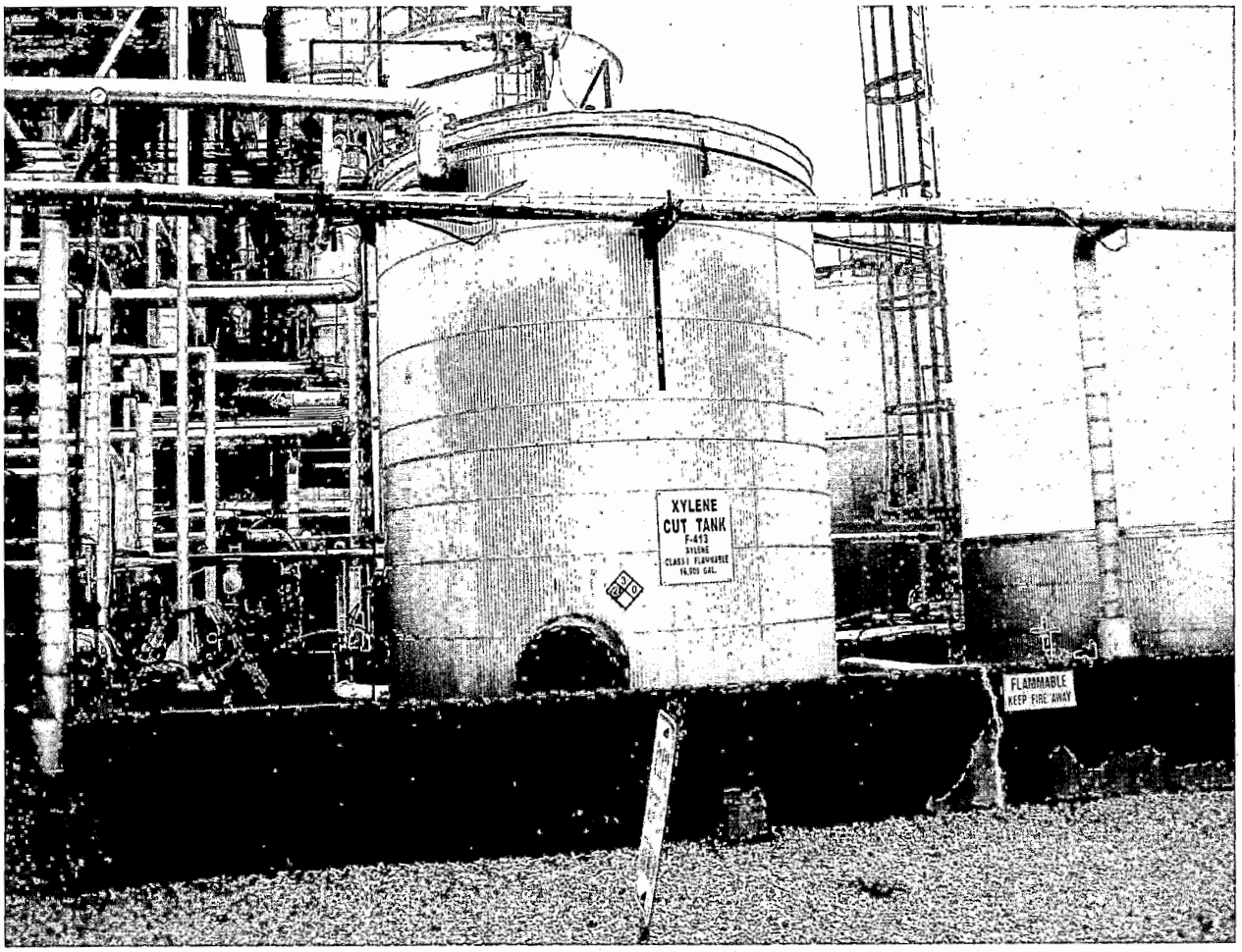
Photo#: 16

This photo depicts the 1411 Pit.



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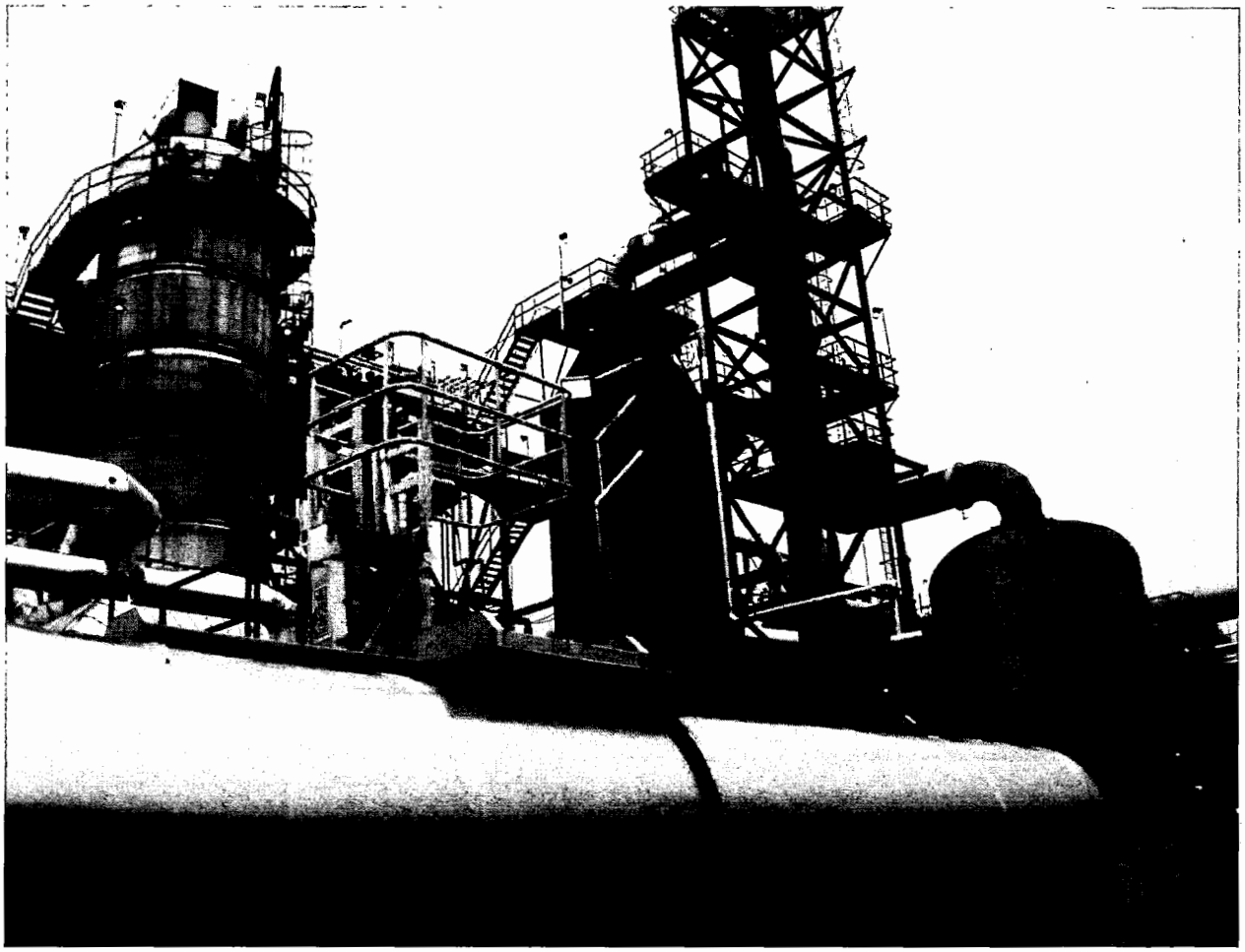
EPA/RIII/Wheeling
Photo#: 17

This photo depicts the Xylene Cut Tank.



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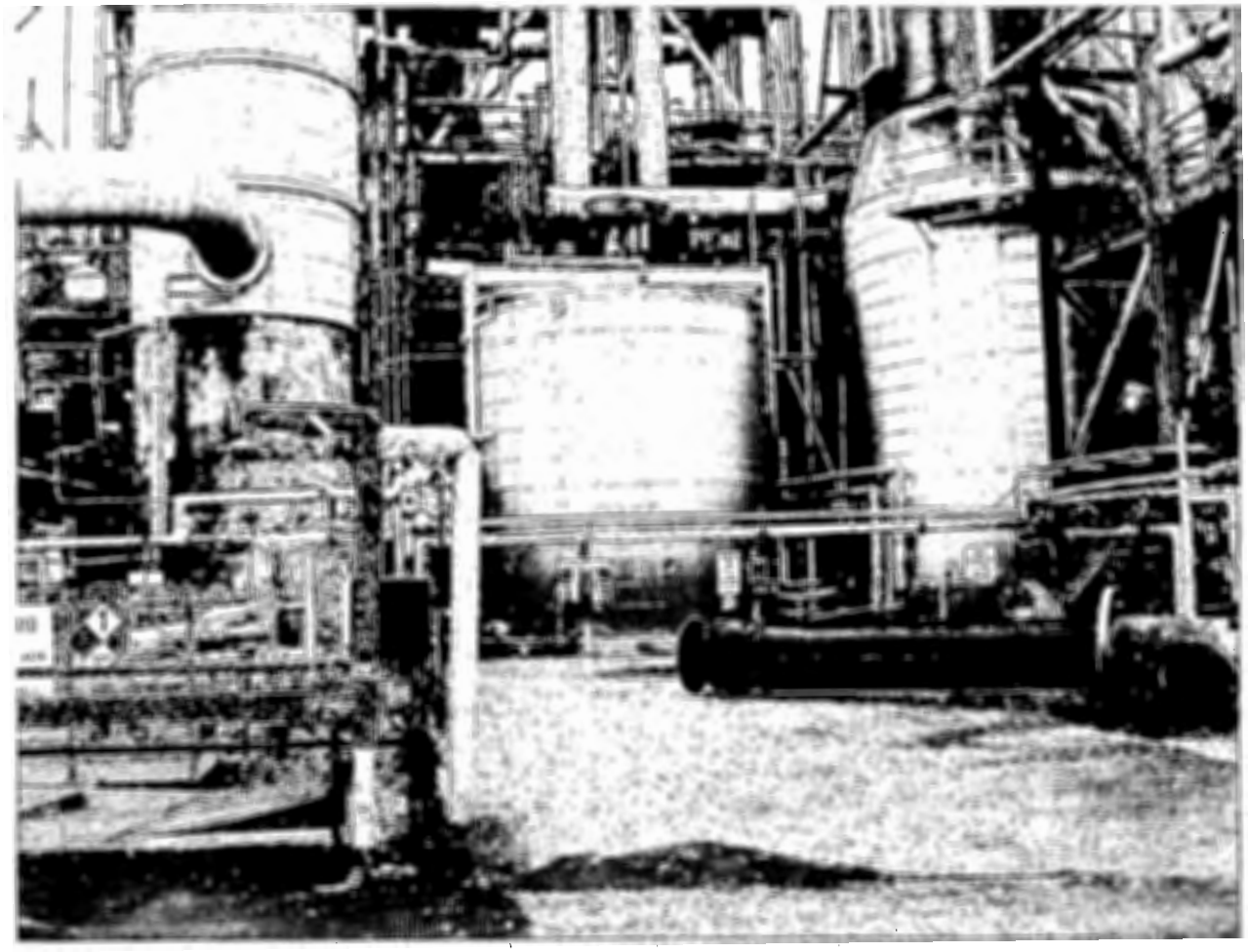
Inspector: Clark S. Conover
EPA/RIII/Wheeling
Photo#: 18

This photo depicts the acid scrubber.



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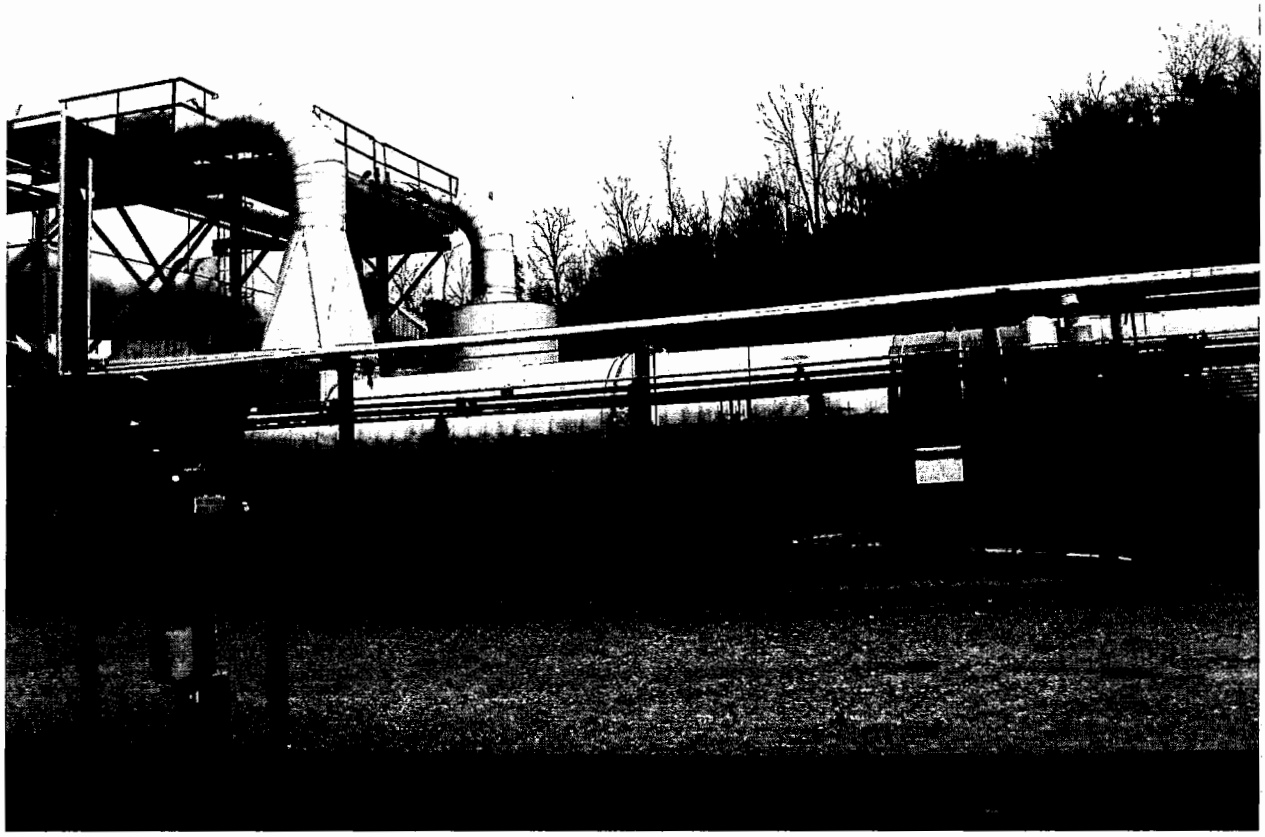
Inspected: January 26, 2012
Inspector: Clark S. Conover
EPA/RIII/Wheeling
Photo#: 19

This photo depicts the Acid Scrubber.



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Photo#: 20

This photo depicts the Incinerator.

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Photo#: 21

This photo depicts the Batch Refiner.

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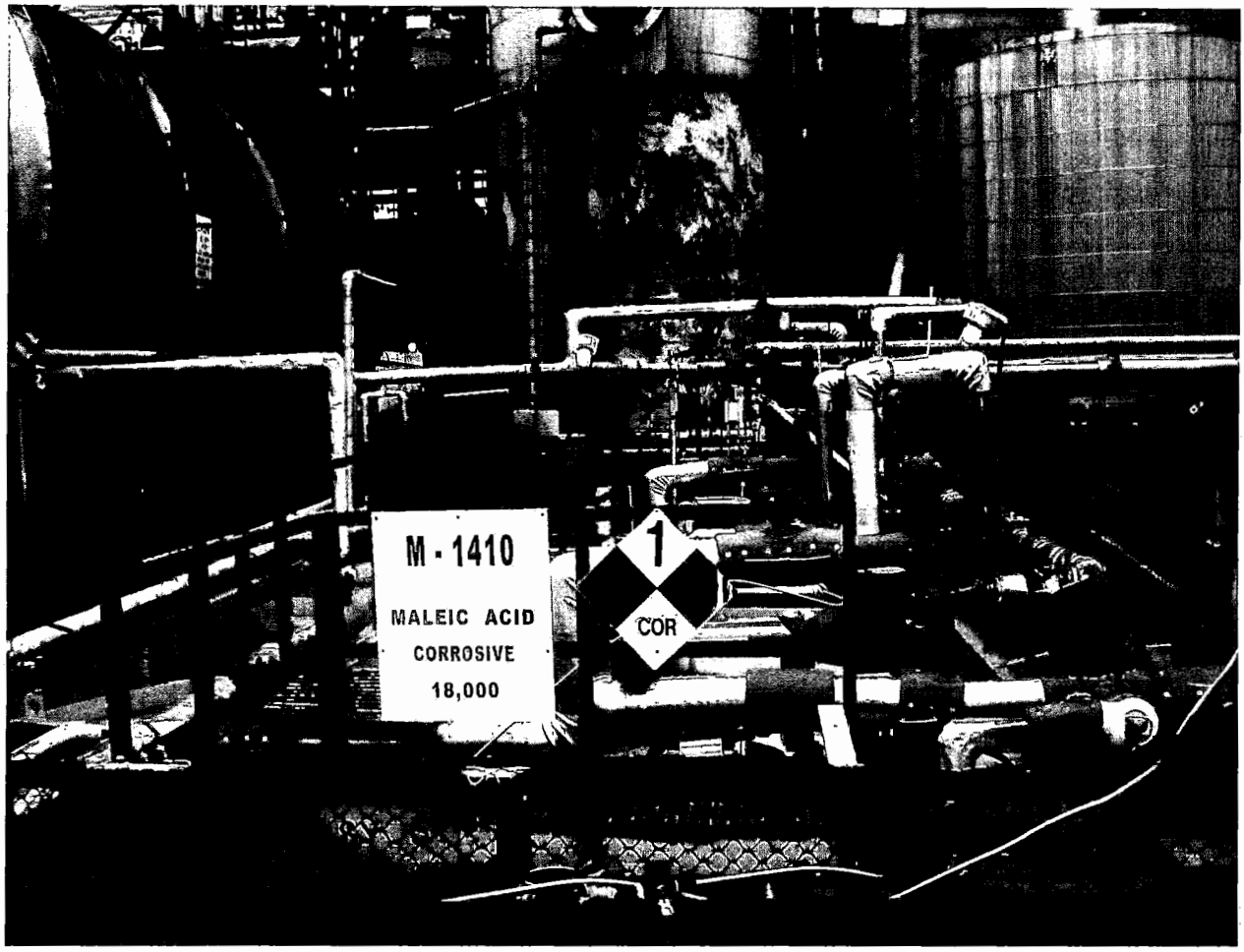
Photo#: 22

This photo depicts the Still Pot.



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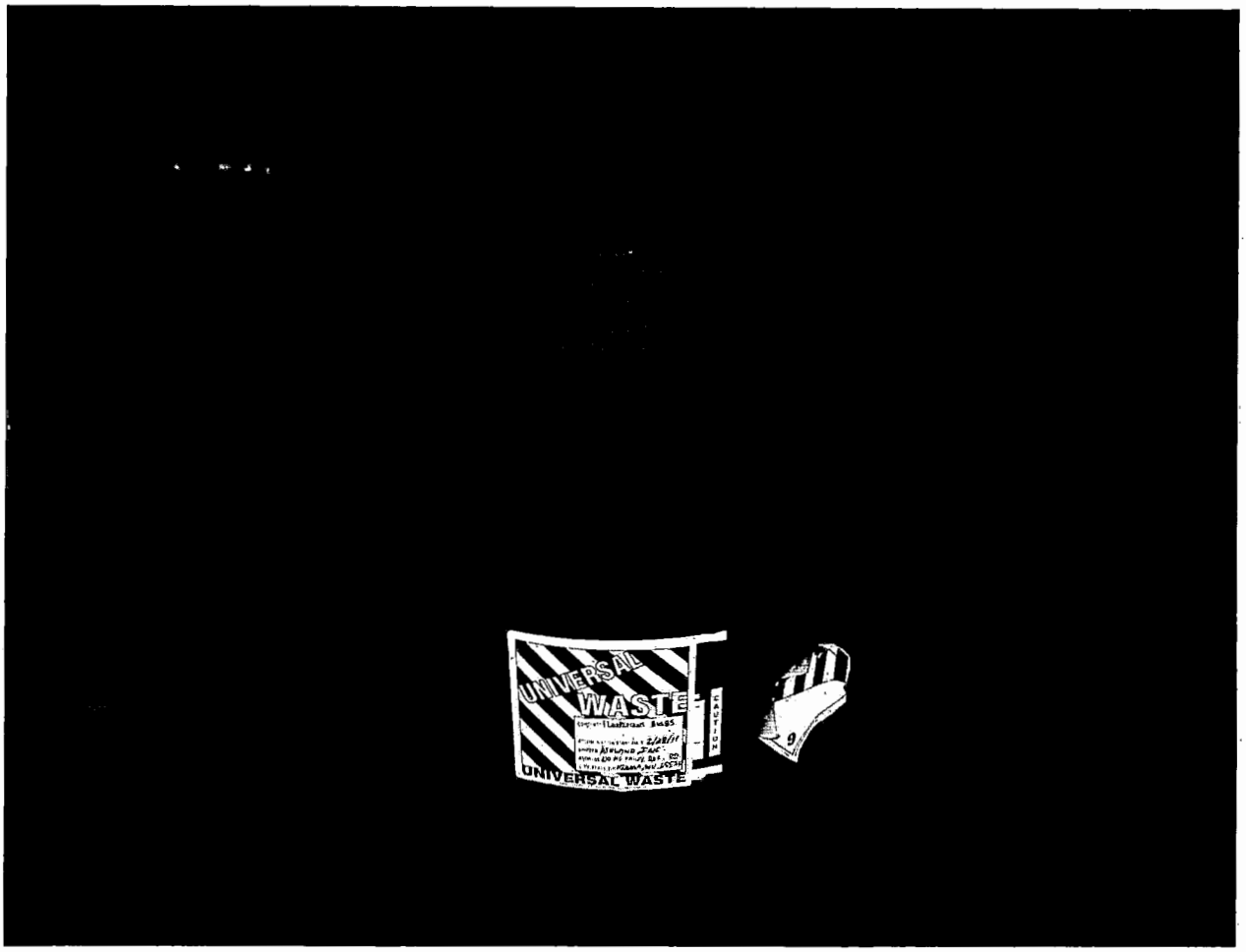
Photo#: 23

This photo depicts the waste Maleic Acid Tank.



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Photo#: 24

This photo depicts the used flourescent light bulb storage.

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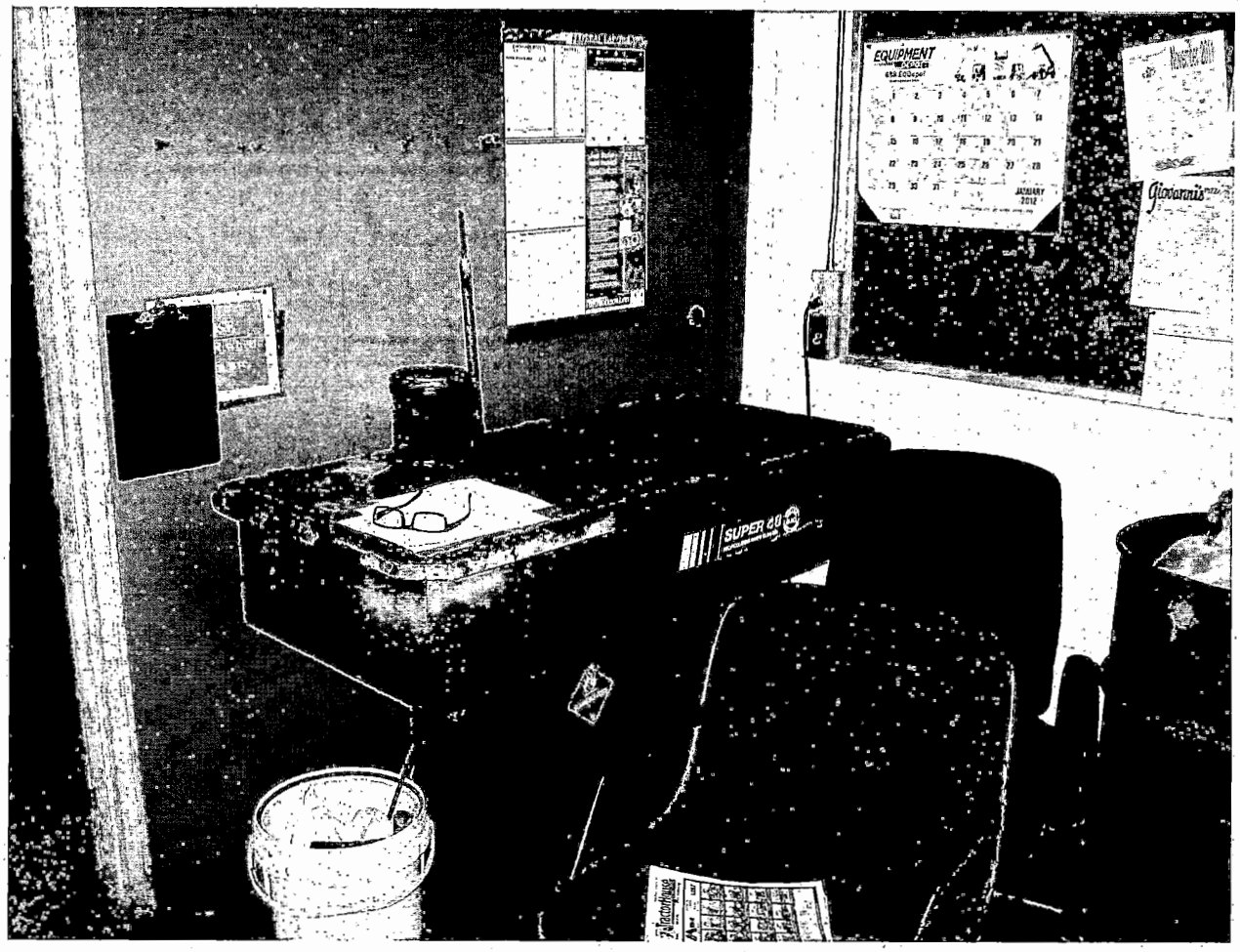
Photo#: 25

This photo depicts the used fluorescent light bulb storage.



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Photo#: 26

This photo depicts the parts cleaner the maintenance shop.

Addendum 1
Biennial Report